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Department of Energy

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92-RPB-143

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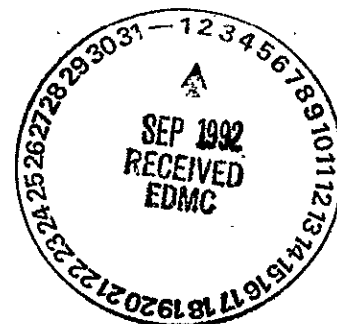
Mr. David B. Jansen, P.E.
Hanford Project Manager
State of Washington
Department of Ecology
Post Office Box 47600
Olympia, Washington 98504-7600

Dear Messrs. Day and Jansen:

RESPONSE TO ECOLOGY REQUEST FOR 2101-M POND DOCUMENTS

At the April 9, 1992, 2101-M Pond Unit Managers Meeting (UMM), the State of Washington Department of Ecology (Ecology) submitted a list of documents to the DOE Richland Field Office (RL), which are being requested for the 2101-M Pond. The list of documents was attached to a cover letter from PTI Environmental Services (an Ecology subcontractor) to Ecology (Ms. E. A. Wiley). In the letter, PTI Environmental Services stated that the documents were needed to validate the 2101-M Pond sample and analysis data previously provided by RL. The types of documents being requested included case narratives, a number of Contract Laboratory Program (CLP) Equivalent Forms, and all laboratory bench sheets for various types of analyses. The additional documentation requested by Ecology is not routinely supplied with Test Methods for Evaluating Solid Waste, Physical/Chemical Methods (EPA/SW-846) data, and exceeds the requirements of the Hanford Federal Facility Agreement and Consent Order (Tri-Party Agreement). Requiring CLP validation and requesting additional documentation to support the CLP validation is beyond the scope of Ecology's authority.

Based on the data quality objectives, RL maintains that the documentation provided is sufficient to validate the data utilizing EPA/SW-846 protocols. In previous discussions with Ecology, it was informally indicated to RL and the Westinghouse Hanford Company (WHC) that Ecology is considering requiring any Resource Conservation and Recovery Act (RCRA) Treatment, Storage, and Disposal (TSD) Unit at the Hanford Site considered for clean closure to have the Quality Assurance/Quality Control (QA/QC) for all sample analyses follow CLP protocols.



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For the closure of a RCRA TSD Unit, the analytical QA/QC requirements are driven by the data quality objectives for the sample in accordance with the Tri-Party Agreement, Section 6.5 of the Action Plan. Being a signatory party to the Tri-Party Agreement, RL has agreed to comply with the U.S. Environmental Protection Agency (EPA) guidance documents for QA/QC, and sampling listed in Section 6.5 (TSD Units) and 7.8 (Past Practices) of the Action Plan. RL has identified in the 2101-M Pond Closure Plan (Section B-5b and Appendix E-2, 7.0), that samples would be analyzed in accordance with EPA/SW-846 protocol or other standard methods when EPA/SW-846 methods are not available.

The Washington Administrative Code (WAC) Chapter 173-303-110 lists EPA/SW-846 methods as guidance that may be used for analysis and QA/QC; no CLP guidance documents are listed. The EPA/SW-846 protocols, not CLP protocols, are the guidance for RCRA TSD closure activities in 40 Code of Federal Regulations 261, App. III, WAC 173-303-110, and the Tri-Party Agreement (Section 6.5 of the Action Plan). Ecology has not provided any technical justification that additional documentation, above and beyond the procedures already in place, or that CLP validation is necessary to protect human health and the environment.

Validation of the data will be performed by the WHC using the available documentation. The validation procedures are available to Ecology in the WHC controlled manual, "Sample Management and Administration," WHC-CM-5-3, Section 2.0, Data Validation for Resource Conservation and Recovery Act (RCRA) Analyses.

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Should you have any questions, please contact Mr. R. G. McLeod of RL on
(509) 372-0096 or Ms. S. M. Price of WHC on (509) 376-1653.

Sincerely,

James D. Bauer
for R. D. Izatt, Program Manager
Office of Environmental Assurance,
Permits, and Policy
DOE Richland Field Office

R. E. Lerch

R. E. Lerch, Manager
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Subject: RESPONSE TO ECOLOGY REQUEST FOR 2101-M POND DOCUMENTS

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